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Counsel for Defendant MORAGA

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

STANISLAV PETROV and MILAGRO
MORAGA,

Defendants.

Case No. CR 16-00159 WHA

**STIPULATION AND ~~[PROPOSED]~~
ORDER EXCLUDING TIME
FROM MAY 17, 2016, TO JUNE 21,
2016**

The United States of America, by and through Assistant United States Attorney Damali Taylor, and defendants Milagro Moraga, by and through defense counsel Carmen A. Smarandoiu, and Stanislav Petrov, by and through defense counsel William Osterhoudt, hereby stipulate that, with the Court's approval, the time between May 17, 2016 and June 21, 2016 is excludable under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), for effective preparation of counsel.

The parties appeared before the Court on May 17, 2016, at 2:00 p.m., for an initial status hearing in this proceeding. Upon the request of the parties, the Court set a further status hearing in this matter for June 21, 2016, at 2:00 p.m. Upon the representation of AUSA Taylor that she will provide additional discovery and the representation of defense counsel that they need additional time to review discovery and conduct necessary investigation, the parties requested that time be excluded under the Speedy Trial

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Act between May 17, 2016 and June 21, 2016, for effective preparation of counsel, under 18 U.S.C. § 3161(h)(7)(B)(iv).

The parties stipulate that the failure to exclude time would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence under 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate that the requested exclusion of time, from May 17, 2016 to June 21, 2016, is in the interests of justice and outweighs the best interest of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

IT IS SO STIPULATED.

Dated: May 18, 2016 /s/

CARMEN SMARANDOIU
Assistant Federal Public Defender
Attorney for Defendant Milagro Moraga

Dated: May 18, 2016 /s/

WILLIAM OSTERHOUDT
Attorney for Defendant Stanislav Petrov

Dated: May 18, 2016 /s/

DAMALI TAYLOR
Assistant United States Attorney
Attorney for the United States of America

Attestation of Filer

In addition to myself, the other signatories to this document are William Osterhoudt and Damali Taylor. I hereby attest that I have their permission to enter a conformed signature on their behalf and to file this document.

Dated: May 18, 2016 /s/

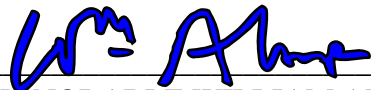
CARMEN SMARANDOIU
Assistant Federal Public Defender
Attorney for Defendant Milagro Moraga

[PROPOSED] ORDER

Based upon the representation of counsel and for good cause shown, the Court finds that failing to exclude the time between May 17, 2016 and June 21, 2016, would unreasonably deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between May 17, 2016 and June 21, 2016, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, IT IS HEREBY ORDERED that the time between May 17, 2016 and June 21, 2016, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: June 20, 2016.



HONORABLE WILLIAM ALSUP
United States District Judge